

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

**MARY TURNER and TYLER
CRUTCHFIELD**, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

**SHARI'S MANAGEMENT
CORPORATION**, a Foreign Profit
Corporation, and **DOES 1-10**, inclusive,

Defendants.

CASE NO. 3:24-cv-05577-JNW

**STIPULATION AND ORDER
EXTENDING DEADLINES FOR
INITIAL DISCLOSURES, JOINT
STATUS REPORT, AND EARLY
SETTLEMENT**

(Clerk's Action Required)

Pursuant to Federal Rule of Civil Procedure 6(b), the Parties hereby stipulate to and jointly request a brief continuance of the early case deadlines set by the Court. In support of this stipulation, the Parties state as follows:

1. The Court issued its Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement on August 21, 2024. ECF No. 9. Therein, the Court set the following deadlines:

a. Deadline for FRCP 26(f) Conference – September 11, 2024

b. Initial Disclosures Pursuant to FRCP 26(a)(1) – September 25, 2024

c. Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f) – October 2, 2024

2. The Parties are discussing potential resolution of the action through an exchange of informal discovery and mediation, and the Parties have scheduled a private mediation for January 9, 2025.

3. As such, the Parties respectfully request that the Court extend each of the deadlines set forth in the August 21, 2024 Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement as follows:

a. Deadline for FRCP 26(f) Conference – Completed within 10 days of the Parties' January 9, 2025 mediation if the mediation is unsuccessful

b. Initial Disclosures Pursuant to FRCP 26(a)(1) – 24 days after the Parties' January 9, 2025 mediation if the mediation is unsuccessful

c. Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f) – 31 days after the Parties' January 9, 2025 mediation if the mediation is unsuccessful

d. A stay of all discovery and motion practice until January 10, 2025 unless otherwise requested or agreed to by the Parties. This recognizes that the parties will exchange discovery informally for purposes of the private mediation.

4. If the Parties resolve the matter, the Parties will promptly notify the Courtroom Deputy per the Court's Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement.

5. This stipulation for an extension of time is made in good faith and is not made for purposes of undue delay.

Dated this 23rd day of August, 2024.

/s/Craig J. Ackermann

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ORDER

IT IS SO ORDERED.

DATED this 26 day of August, 2024.



Jamal N. Whitehead
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on August 23, 2024, I served the foregoing STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINES FOR INITIAL DISCLOSURES, JOINT STATUS REPORT, AND EARLY SETTLEMENT via the method(s) below to the counsel for Defendant:

- ☒ by **electronic** means through the Court's Case Management/Electronic Case File system, which will send automatic notification of filing to each person listed above.
- ☐ by **mailing** a true and correct copy to the last known address of each person listed above. It was contained in a sealed envelope, with postage paid, addressed as stated above, and deposited with the U.S. Postal Service in Seattle, Washington.
- ☐ by **e-mailing** a true and correct copy to the last known email address of each person listed above.

SIGNED THIS 23rd day of August, 2024 at Beverly Hills, California.

ACKERMANN & TILAJEF, P.C.

By: /s/Jaclyn Blackwell
Jaclyn Blackwell
Office Manager